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January 21, 2021

Honorable Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

RE: United States v. Constantinescu  
19 Cr. 651 (LTS)

Dear Judge Swain,

I represent Ionela Constantinescu in the above referenced-matter and write to request a modification of Ms. Constantinescu's bail conditions by removing the currently required curfew. Ionela would still be subject to standalone GPS enforced with location monitoring.

The reason for the request is that Ionela has been working for the past 4 months as a driver for a transportation company. She has excelled at her job and has been taking on additional work including pickups very early in the morning. By removing the curfew, Ms. Constantinescu will be able to take on her additional pickups without the extra steps of notifying pretrial services every time.

I communicated with her pretrial services officer, Rena Bolin and with the government in regards to this request. The government consents. Ms. Bolin consents.

Thank you for your consideration.

Respectfully,

\_\_\_\_\_/S/\_\_\_\_\_  
Jacob Mitchell  
Ezra Spilke  
Counsel for Ionela Constantinescu

The requested modification is granted. DE#453 resolved.

SO ORDERED.

1/21/2021

/s/ Laura Taylor Swain, USDJ

